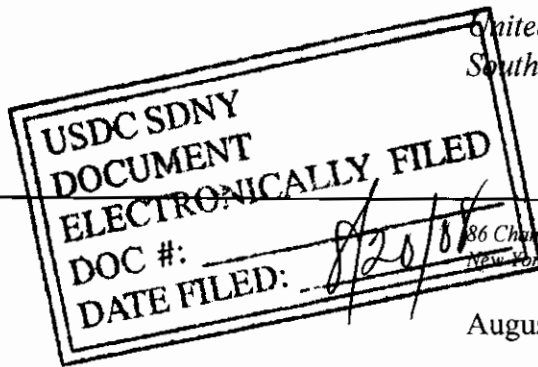


U.S. Department of Justice



United States Attorney  
Southern District of New York



86 Chambers Street  
New York, New York 10007

August 15, 2008

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AUG 18 2008

LORETTA A. PRESKA  
U.S. DISTRICT JUDGE  
S. D. N. Y.

BY HAND

Hon. Loretta A. Preska  
United States District Judge  
United States District Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Amnesty International USA v. Central Intelligence Agency, 07 CV 5435 (LAP)

Dear Judge Preska:

In accordance with the Court's instructions at the conference held on August 8, 2008, the parties jointly submit for the Court's approval proposed schedules for (i) the Government's motion for a partial stay of proceedings; and (ii) summary judgment motions with respect to the CIA's response to the plaintiffs' December 28, 2007 FOIA request and the Department of Justice's Office of Intelligence Policy and Review's ("OIPR") response to plaintiffs' three initial FOIA requests.

First, with respect to the Government's motion for a partial stay of proceedings, as the parties informed the Court at the August 8, 2008 conference, the proposed schedule for the Government's motion is as follows:

Government's Motion for a Partial Stay	August 12, 2008
Plaintiffs' Opposition	August 20, 2008
Government's Reply	August 26, 2008

Your Honor's law clerk has informed us that argument has been scheduled on the stay motion for August 29, 2008, at 9:00 a.m. In accordance with this proposed schedule, the Government electronically filed its motion for a partial stay of these proceedings on August 12, 2008. As the Court requested, two courtesy copies of the Government's moving papers are enclosed herein.

In light of the scheduling on the stay motion, the parties have agreed that the CIA's Opposition to Plaintiffs' Cross-Motion for Summary Judgment and Reply Brief in Support of the CIA's Motion for Summary Judgment, which was previously due on August 29, will now be due on September 4, 2008, and plaintiffs' reply brief will be due on September 19, 2008.

Second, the parties have also agreed that all issues related to the OIPR's response to the three initial FOIA requests and the CIA's response to plaintiffs' December 28, 2007 FOIA request — other than any portions of the December 28, 2007 request that are ordered stayed by the Court — will be ripe for summary judgment in the fall. Accordingly, the parties have agreed upon the following schedule with respect to that summary judgment motion:

CIA/OIPR's Motion for Summary Judgment	October 31, 2008
Plaintiffs' Opposition and Cross-Motion for Summary Judgment	December 8, 2008
CIA/OIPR's Opposition to Cross-Motion	January 16, 2009
Plaintiffs' Reply	January 30, 2009

Although the parties had indicated that this letter would also contain a negotiated schedule with respect to the remaining DOJ components, the parties have yet to reach agreement on these issues. The parties are continuing their discussions, however, and will inform the Court of the results of these negotiations as soon as they are complete.

The parties respectfully request that the Court approve the proposed schedules. We thank the Court for its consideration of this request.

Respectfully,

MICHAEL J. GARCIA  
United States Attorney

SO ORDERED

*Loretta A. Preska*  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

*August 20, 2008*

By:

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Encl.

cc: **BY ELECTRONIC MAIL AND FIRST CLASS MAIL (without enclosure)**

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